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Attorneys for Defendant Stewart Title Guaranty Company

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

COUNTRYWIDE HOME LOANS, INC., a)	Case No. C 07-04047 EMC
New York corporation;)	
)	
Plaintiff,)	RULE 26 (f) REPORT OF THE PARTIES
)	
v.)	
)	
STEWART TITLE GUARANTY)	
COMPANY, a Texas corporation; and DOE 1)	
through DOE 20, inclusive,)	
)	
Defendants.)	

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on November 6, 2007, and was attended by: Annabelle de la Mora of Pfeifer & Reynolds, LLP, one of the attorneys of record for Plaintiff Countrywide Home Loans, Inc. ("Countrywide"), and Michael Veiluva of Alborg, Veiluva & Epstein LLP, counsel for defendant Stewart Title Guaranty Company ("Stewart Title").

2. Recommended discovery plan:

(A) The parties will exchange pre-discovery disclosures required by Rule 26(a)(1) as soon as possible, but no later than November 30, 2007.

(B) After the initial exchange of documents, additional discovery will be needed by Countrywide as to the origination of the mortgage loan purchased by Countrywide from CHL in December 2003, the assignment of the deed of trust to Countrywide, the refinance loan transaction that recorded on May 4, 2004, exclusions under title insurance policy issued by Stewart Title, defenses raised by Stewart Title, and other issues later determined through discovery. Discovery will be needed by Stewart Title regarding the assignment from CHL to Countrywide, servicing of the loan, and disposition in the special assets/nonperforming loan division of the lender. Discovery should be completed May 31, 2008.

(C) The parties agreed to preserve electronically stored information and to preserve their respective files relating to the matters raised in the complaint and answer. The form of production for such electronically stored information will be discussed as the need arises after initial disclosures.

(D) Any claims of privilege or protection will be discussed as the need arises after the initial disclosures.

(E) Limitations on discovery will be discussed as the need arises after initial disclosures. It is too early for the parties to determine whether any limitations or modifications to the discovery rules are necessary.

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1 (F) The parties request that a further Case Management Conference be set at
2 least 60 days after the initial Case Management Conference. By that time the initial disclosures
3 will have been completed and the parties will be in a better position to discuss ADR and other
4 stipulations and agreements regarding limitations on discovery.

5 Dated: November 7, 2007

PFEIFER & REYNOLDS, LLP

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7 By: /s/ Michael R. Pfeifer
8 MICHAEL R. PFEIFER, ESQ.
9 JAMES P. FINERTY, ESQ.
Attorneys for Plaintiff
COUNTRYWIDE HOME LOANS, INC.

10 Dated: November 7, 2007

ALBORG, VEILUVA & EPSTEIN LLP

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12 By: /s/ Michael J. Veiluva
13 MICHAEL J. VEILUVA, ESQ.
14 DARRELL C. MARTIN, ESQ.
Attorneys for Defendant
15 STEWART TITLE GUARANTY COMPANY
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